

Tata Communications (America) Inc.
Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

Date filed: February 28, 2019

Name of company covered by this certification: Tata Communications (America) Inc.

Form 499 Filer ID: 823568

Name of Signatory: David Ryan

Title of signatory: Senior Vice President

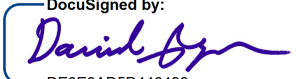
I, David Ryan, certify that I am an officer of the company named above ("TC America"), and acting as an agent of TC America, that I have personal knowledge that TC America has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

TC America has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at state commissions, the court system, or at the Commission) against data brokers in the past year.

TC America has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

TC America represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. TC America also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 
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David Ryan, Senior Vice President

Attachment: Accompanying Statement explaining CPNI procedures

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Accompanying Statement

Tata Communications (America) Inc. ("TC America") is primarily an international carrier serving other carriers, Internet service providers and large enterprise customers. TC America typically transports the "middle" segment only of circuit-switched voice or Voice over Internet Protocol ("VoIP") international calls. TC America interconnects with U.S. interexchange carriers at the carrier hotel level (above the access tandem level) where traffic is handed off to TC America by its carrier customers, and then TC America transports that traffic to another interexchange carrier, usually overseas, for ultimate termination. TC America also transports traffic, handed off to TC America overseas by foreign carriers, into the U.S. Once the traffic is in the U.S., TC America hands off the traffic to another carrier, which directly or indirectly terminates the traffic. TC America also provides a wide range of information and voice and data telecommunications services to enterprise customers by means of direct access arrangements connecting such customers with TC America's network.

TC America's policy is to not use CPNI in outbound marketing campaigns in a manner that would require customer consent. Typically, new customers come to TC America seeking the best price for their voice termination requirements. TC America first signs a nondisclosure agreement with the prospective customer and then markets to them using TC America's prices for traffic termination destinations served. Enterprise or wholesale voice transport carrier prospects that TC America contacts (*i.e.*, that do not contact us first) generally are identified through public sources such as industry magazines. TC America may initiate contact with the customer using CPNI for billing, maintenance and repair purposes, and to inquire about the customer's satisfaction with its existing services.

Furthermore, TC America does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third parties for the purposes of marketing any services. The provision of CPNI to any unrelated third party is strictly prohibited except for billing purposes, for the provision, maintenance and repair of services, to protect rights or property of TC America, or pursuant to legal process.

TC America is committed to protecting the confidentiality of all customer information, including CPNI. TC America has implemented password protection for customer access to account information. TC America's individual customer contracts contain confidentiality and personal data protection requirements regarding the treatment of customer account information, including CPNI, and TC America employees are prohibited from disclosing such information. All TC America personnel have certified in writing that they have read and will adhere to the Code of Conduct ("Code"), which contains strict confidentiality requirements for all customer confidential information, including CPNI, and provides for disciplinary action for violation up to, and including, immediate termination of employment. In fact, as part of an overall program of legal compliance training for TC America employees, TC America has instituted a web-based,

as well in-person training programs that instruct employees on a variety of legal compliance matters, including regular trainings related to the Code and handling and maintaining confidentiality of personal information of customers. Additionally, at the time of hiring, all new personnel must sign an agreement on Confidential Information, Intellectual Property and Exclusivity Undertakings, which includes confidentiality requirements such as maintaining the confidentiality of customer information. TC America personnel, who are authorized to access CPNI, are trained in the authorized uses of this information.

TC America is prepared to comply with applicable breach notification laws in the event of a CPNI breach.